

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

REGINA LEE, on behalf of herself and all
others similarly situated,

Plaintiff,

v.

FIRST ADVANTAGE BACKGROUND
SERVICES CORP. and AMAZON.COM,
INC.,

Defendants.

Case No. 2:24-cv-00103-JHC

SECOND STIPULATED MOTION
FOR EXTENSION OF TIME

NOTE ON MOTION CALENDAR:
February 29, 2024 (Same Day Motion)

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, Rule 7 of the Local Civil Rules, and the Court's February 22, 2024 Order Regarding Initial Disclosures, Joint Status Report, and Early Settlement (Dkt. # 21, ["Initial Scheduling Order"]), Plaintiff REGINA LEE, Defendant FIRST ADVANTAGE BACKGROUND SERVICES CORP., and Defendant AMAZON.COM, INC. stipulate and agree to, and hereby move for, a three-week extension of the deadline for First Advantage to answer or otherwise respond to Plaintiff's Class Action Complaint from March 1, 2024 to March 22, 2024. The parties also stipulate and agree to, and hereby move for, a corresponding three-week extension of the deadlines in the Court's Initial Scheduling Order. As grounds for this stipulated motion, the parties state as follows:

WHEREAS, Plaintiff filed her Class Action Complaint in this action in the Superior Court of the State of Washington for King County on December 19, 2023;

1 WHEREAS, on January 24, 2024, Amazon timely filed a Notice of Removal in this Court
2 (Dkt. # 1);

3 WHEREAS, on January 26, 2024, the parties filed a Stipulated Motion for an Extension of
4 Time seeking an extension of Defendants' responsive pleading deadline from January 31, 2024 to
5 March 1, 2024 (Dkt. # 10). That same day, the Court granted the parties' Stipulated Motion for
6 an Extension of Time (Dkt. # 14);

7 WHEREAS, on February 22, 2024, the Court entered the Initial Scheduling Order, which
8 "set[] the following dates for initial disclosure and submission of the Joint Report and Discovery
9 Plan":

10	Deadline for FRCP 26(f) Conference:	March 7, 2024
11	Initial Disclosures Pursuant to FRCP 26(a)(1):	March 21, 2024
12	Combined Joint Status Report and Discovery	
13	Plan as Required by FRCP 26(f)	
	and Local Civil Rule 26(f):	March 28, 2024;

14 WHEREAS, First Advantage has been diligently investigating the allegations and claim
15 asserted in Plaintiff's Class Action Complaint but needs additional time to complete its
16 investigation and prepare a response. Moreover, counsel for Plaintiff and First Advantage have
17 informally exchanged documents and information related to Plaintiff's allegations and claim, and
18 have discussed the possibility of resolving Plaintiff's claim against First Advantage without the
19 need for further litigation. Plaintiff and First Advantage need additional time to explore that
20 possibility;

21 WHEREAS, the parties, through their counsel, hereby stipulate and agree that First
22 Advantage should have until March 22, 2024 to answer or otherwise respond to Plaintiff's
23 Complaint;

24 WHEREAS, the parties, through their counsel, also stipulate and agree that the deadlines
25 in the Court's Initial Scheduling Conference should be extended as follows:

1 Deadline for FRCP 26(f) Conference: March 28, 2024

2 Initial Disclosures Pursuant to FRCP 26(a)(1): April 11, 2024

3 Combined Joint Status Report and Discovery
4 Plan as Required by FRCP 26(f)
and Local Civil Rule 26(f): April 18, 2024;

5 WHEREAS, this is First Advantage's second request for an extension of time in this action.

6 WHEREAS, this request is made in good faith and will not affect any other deadlines or
7 the just, speedy, and inexpensive determination of this action. *See* Fed. R. Civ. P. 1.

8 NOW THEREFORE, the parties stipulate to the following:

9 1. To extend the deadline for First Advantage to answer or otherwise respond to
10 Plaintiff's Class Action Complaint from March 1, 2024 to March 22, 2024.

11 2. To extend the deadlines in the Court's Initial Scheduling Order as follows:

12 Deadline for FRCP 26(f) Conference: March 28, 2024

13 Initial Disclosures Pursuant to FRCP 26(a)(1): April 11, 2024

14 Combined Joint Status Report and Discovery
15 Plan as Required by FRCP 26(f)
and Local Civil Rule 26(f): April 18, 2024

1 **STIPULATED AND AGREED TO** this 29th day of February, 2024

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*Attorneys for Defendant First Advantage
Background Services Corp.*

ORDER

Dated this 1st day of March, 2024.

IT IS SO ORDERED.

A handwritten signature in cursive script, reading "John H. Chun".

JOHN H. CHUN
UNITED STATES DISTRICT JUDGE